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*Attorneys for Defendants CLIFFORD J. FINDLAY
and DONNA SUE FINDLAY, individually and as
Trustees, CLIFF FINDLAY AND DONNA S.
FINDLAY FAMILY TRUST, DATED FEBRUARY
20, 1986; FINDLAY MANAGEMENT GROUP;
FINDLAY-NOLTE AUTOMOTIVE, LLC; CLIFF
FINDLAY AUTOMOTIVE, LLC; FINDLAY AUTO
HOLDINGS, LLC; CLIFF FINDLAY AUTO
CENTER; and TYLER CORDER*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

AMTRUST INTERNATIONAL UNDERWRITERS,
LIMITED,

Plaintiff,

v.

CLIFFORD J. FINDLAY and DONNA SUE
FINDLAY, individually and as Trustees, CLIFF
FINDLAY AND DONNA S. FINDLAY FAMILY
TRUST, DATED FEBRUARY 20, 1986; FINDLAY
MANAGEMENT GROUP; FINDLAY-NOLTE
AUTOMOTIVE, LLC; CLIFF FINDLAY

Case No. 2:18-cv-00652-JCM-VCF

**JOINT MOTION FOR AN
EXTENSION TO RESPOND TO
COMPLAINT
(FIRST REQUEST)**

AUTOMOTIVE, LLC; FINDLAY AUTO
HOLDINGS, LLC; CLIFF FINDLAY AUTO
CENTER; TYLER CORDER; and WINDMILL
FARMS, INC.,

Defendants.

Defendants CLIFFORD J. FINDLAY, DONNA SUE FINDLAY, CLIFF FINDLAY AND
DONNA S. FINDLAY FAMILY TRUST, DATED FEBRUARY 20, 1986; FINDLAY
MANAGEMENT GROUP; FINDLAY-NOLTE AUTOMOTIVE, LLC; CLIFF FINDLAY
AUTOMOTIVE, LLC; FINDLAY AUTO HOLDINGS, LLC; CLIFF FINDLAY AUTO
CENTER; and TYLER CORDER (collectively, “Defendants”), and Plaintiff AMTRUST
INTERNATIONAL UNDERWRITERS, LIMITED (“Plaintiff” or “Amtrust”), by and through
the undersigned counsel and pursuant to Rule 6 of the Federal Rules of Civil Procedure and Local
Rules 6-1 and 6-2, hereby stipulate to a thirty-day (“30”) extension until Wednesday, July 25,
2018, for Defendants to respond to Plaintiff’s First Amended Complaint for Declaratory
Judgment (Dkt. No. 4). This is the first stipulation for an extension of time to respond to
Plaintiff’s Amended Complaint. In support of this Stipulation, the Parties hereby state the
following:

1. On April 11, 2018, Plaintiff filed a Complaint (Dkt. No. 1) against Defendants and
Defendant Windmill Farms, Inc.

2. On April 20, 2018, Plaintiff filed an Amended Complaint (Dkt. No. 4) against
Defendants and Defendant Windmill Farms, Inc.

3. On April 27, 2018, Plaintiff sent service of summons waivers to the Defendants,
which were executed and returned by the Defendants. As such, Defendants’ response to
Plaintiff’s Amended Complaint is due on June 26, 2018.

4. Before Defendants’ time to respond to Plaintiff’s Amended Complaint expired, the
Parties agreed to extend Defendants’ time to respond to Plaintiff’s Amended Complaint by thirty
(“30”) days to July 25, 2018.

5. The Parties, through their undersigned counsel, consented to this extension of time

for Defendants to respond to Plaintiff's Amended Complaint.

DATED this 26th day of June 2018.

Respectfully submitted,

SEMENZA KIRCHER RICKARD

WILSON, ELSE, MOSKOWITZ,
EDELMAN & DICKER LLP

By: /s/ Christopher D. Kircher
Christopher D. Kircher

By: /s/ Sheri Thome
Sheri Thome

and

and

PILLSBURY WINTHROP SHAW
PITTMAN LLP

RUBERRY, STALMACK &
GARVEY, LLC

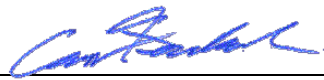
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Dennis B. Condon

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20, 1986; FINDLAY MANAGEMENT
GROUP; FINDLAY-NOLTE AUTOMOTIVE,
LLC; CLIFF FINDLAY AUTOMOTIVE, LLC;
FINDLAY AUTO HOLDINGS, LLC; CLIFF
FINDLAY AUTO CENTER; and TYLER CORDER*

*Attorneys for Plaintiff AMTRUST
INTERNATIONAL UNDERWRITERS,
LIMITED*

IT IS SO ORDERED:


Cam Ferenbach

United States Magistrate Judge

Dated: 6-27-2018